

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

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Mail Processing Network Rationalization)	Docket No. N2012-1
Service Changes, 2012)	
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DIRECT TESTIMONY OF JAMES HAGGARTY
ON BEHALF OF THE NATIONAL POSTAL MAIL HANDLERS UNION
(NPMHU-T-4)

My name is James Haggarty. I am currently a Mail Handler employed by the United States Postal Service at the Grand Rapids, Michigan P&DC. I am also currently President of Local 307 of the National Postal Mail Handlers Union (NPMHU), which represents approximately 1300 Mail Handlers in the state of Michigan. I started my career with the Postal Service in 1998. I was hired as a United States Marine Corps veteran with a disability rating. I mention that fact, because a sizeable portion of all Postal employees impacted by these closures and consolidations are veterans, both disabled and not, of the recent Gulf conflicts and of prior wars. Some are even currently deployed, in an active duty status to the war zones.

These American heroes, as well as all Postal employees, should not be subjected to the harsh impacts on their lives, due to the Postal Service's rush to move these massive closures and consolidations forward without thinking them through.

The purpose of my testimony is to provide additional information to the Commission regarding the Postal Service's proposed consolidations in Michigan. Based on my knowledge of

these facilities, my many years as a Postal employee, and my review of the Area Mail Processing (AMP) studies of the Michigan consolidations, I am concerned that the Postal Service has under-estimated the costs of these consolidations and the effects they will have on the efficient delivery of the mail.

The Postal Service is planning a substantial change to the current mail processing and distribution network in Michigan, which includes consolidating the Iron Mountain, Michigan facility into Greenbay, Wisconsin; Jackson into Detroit; Kalamazoo and Lansing into Grand Rapids; Gaylord into Traverse City; and Saginaw into the Michigan Metroplex. The Postal Service plans to continue to operate all of the consolidated facilities as transfer hubs, but has not budgeted for adequate staff to operate these hubs. For instance, in Gaylord, they have not budgeted for any Mail Handlers. In Iron Mountain, they have only budgeted for four Mail Handlers. In Jackson, they have only budgeted for seven Mail Handlers. In comparison, in Kalamazoo, Saginaw and Lansing, they have budgeted for between fourteen to twenty two Mail handlers.

There seems to be no rhyme or reason to the staffing numbers, only that they need to be reduced, regardless of the workload. As machines move out of some facilities, letter carriers will be moved in and the impact on Mail Handler staffing has not yet been calculated. Mail Handlers perform many allied duties in support of the letter carriers, so more carriers normally would mean more Mail Handler work.

The transfer hub is not a new concept for the Postal Service, and, in my experience, the Postal Service has a history of failing to adequately account for the staffing needs of hubs. For instance, the Postal Service closed down mail processing in Flint, Michigan (with originating mail being moved in 2009, and destinating mail in 2011) but retained the facility as a transfer hub. The Postal Service started with fifteen Mail Handlers to consolidate and transfer the mail in Flint, but is now up to nineteen Mail Handlers to perform this work. For the sake of comparison, prior to the consolidation and according to the 2011 AMP study, Flint had a FHP

daily volume of 979,439 pieces. According to its AMP, Gaylord has a FHP daily volume of 400,684—if nineteen full-time Mail Handlers are required to consolidate and transfer 979,439 pieces a day, how can the Postal Service consolidate and transfer 400,684 pieces with zero Mail Handlers?

In addition, it is my understanding that these consolidations depend upon the Postal Service's plan to move to a substantially longer processing window. During my time with the Postal Service, I have witnessed other plans in which the Postal Service tried to operate longer processing windows. Grand Rapids was on a seventeen hour plan several years ago, and this operating plan had to be abandoned because the machines were breaking down too frequently, increasing costs to the Postal Service and delaying the mail significantly. These multi-million dollar machines require precise maintenance routes that take a manufacturer recommended time frame. When they are not adhered to, the machines tend to break down more often and for longer periods of time, interrupting the normal processing runs. Based on my experience, my review of the AMP studies, and my conversations with Postal management, I do not believe that the Postal Service has adequately accounted for the substantial risk of increased equipment failure during these longer processing windows.

Local Postal management has no answers to these questions and concerns. The most baffling aspect of the AMP studies is that the Postal Service is claiming that it will save money on current transportation costs by trucking mail, an average of one hour and twenty minutes to another facility to be processed, and then trucking it back to be delivered.

As a final comment, these changes are being predicated upon the relaxation of current service standards. A viable business model does not decrease customer service as a means of sustaining a customer base.

Respectfully submitted,

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